

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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WISTRON NEWEB CORPORATION;

Plaintiff,

Case No.

v.

22-cv-02538-LJL

GENESIS NETWORKS TELECOM SERVICES, LLC

ECF Case

and GNET ATC, LLC;

Defendants.

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**NOTICE OF DEFENDANT GNET ATC, LLC'S MOTION
TO DISMISS OR, IN THE ALTERNATIVE, FOR TRANSFER OF VENUE**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the Declarations of James Frinzi and Theodore Geiger, the exhibits attached thereto, and all other papers and proceedings in this action, Defendant GNET ATC, LLC ("GNET") will move before The Honorable Lewis J. Liman, United States District Judge for the Southern District of New York, for an Order granting GNET's Motion to Dismiss the Complaint as against GNET pursuant to Federal Rule of Civil Procedure 12(b)(6) or, in the alternative, for transfer to the Northern District of Texas pursuant to 28 U.S.C § 1404.

GNET requests oral argument on this motion as counsel's familiarity with the record and legal authorities supporting these claims and defenses may aid the Court in its decision-making process.

Dated: New York, New York
July 18, 2022

THE LAW OFFICE OF THEODORE GEIGER, PLLC

By: /s/ Theodore S. Geiger
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